

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
BIG STONE GAP DIVISION**

WILLIAM THORPE, *et al.*,

Plaintiffs,

v.

VIRGINIA DEPARTMENT OF
CORRECTIONS, *et al.*,

Defendants.

Civil Case No. 2:20-cv-00007-JPJ-PMS

DECLARATION OF SIDNEY BOWMAN

I, Sidney Bowman, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Sidney Bowman. I am over the age of 21, and I am competent to give this declaration and to testify regarding the matters in this declaration.

2. I am currently housed at Red Onion State Prison in the custody of the Virginia Department of Corrections (“VDOC”). I am currently in Level 6 in the IM Closed pod.

3. I still have not agreed to sign the Safety Agreement, and the power outlets in my cell remain shut off.

4. I am not receiving any accommodations to allow my access to religious programming. In my housing unit, I only get pod recreation occasionally, and am not able to choose when to do pod recreation. When I do have pod recreation, we return to our cells around noon. Muslim religious services are on Fridays and begin around 1:00 p.m. So I would never have the opportunity to observe those services during pod recreation anyway.

5. The prison has never provided me a TV outside of my cell door on which to watch religious services. I do not know how a TV would be plugged in if it were brought outside my cell, so I don’t believe it would be possible to do this. I have never seen this happen at Red

Onion. Even if it did, it would be difficult to view and hear that programming through the cell door.

6. I am not able to fully charge my tablet at the kiosk, which I only have access to for about twenty minutes three times a week on shower days. During this time, the tablet might charge to 3% charge if it's completely dead. In my cell, it takes about 6 hours to completely charge my tablet if starting from no charge. Plugging my tablet into the kiosk does not allow me to use my tablet to the extent that I would if I were able to charge it in my cell. People in some of the other levels of the Step-Down Program only have access to the kiosk once per week.

7. One reason I did not want to sign the Safety Agreement was that it contained statements that conflicted with my past statements to the Court in this case or the testimony I would give if I were to be asked to testify at trial, and I did not want to be on record agreeing with statements I do not believe.

8. On April 10, 2025, my attorney read this declaration to me over the phone, and I confirmed that it is true and accurate to the best of my knowledge.

I declare under penalty of perjury that the statements in this Declaration are true and correct to the best of my knowledge.

/s/ Sidney Bowman
Sidney Bowman

4/10/205
Date